

Exhibit 1

31. Every one of the air samples collected in the presuit investigation within a four-mile radius of the Santa Teresa Plant detected ambient airborne concentrations in excess of the EPA IUR of .03 ug/m³, including one sample that was **96 times the EPA's cancer risk level** (measured at 2.88 ug/m³). A map showing the exceedances of the EPA's IUR threshold appears below:

